

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**COMMERCIAL STEAM CLEANING,
L.L.C., ANDREW E. HAROLD, CARLOS
HESS, and KATHY COLLINS**

Plaintiffs,

v.

**FORD MOTOR COMPANY and
NAVISTAR INTERNATIONAL
CORPORATION,**

Defendants.

Civil Action No.: 2:09-cv-01009

**DEFENDANT FORD MOTOR
COMPANY'S NOTICE OF VIDEOTAPED
DEPOSITION TO NAMED PLAINTIFF
ANDREW E. HAROLD**

PLEASE TAKE NOTICE that Ford Motor Company ("Ford"), by and through its counsel, will take the deposition(s) upon oral examination of Andrew E. Harold pursuant to Rule 30 of the Federal Rules of Civil Procedure.

The deposition(s) shall commence on March 17 at 9:30 a.m., or other mutually agreed upon date and time, at a mutually agreeable location and shall continue from day to day (weekends and holidays excepted) until completed. The deposition(s) shall be videotaped, as well as stenographically recorded, by a duly certified court reported qualified and authorized to administer oaths.

Dated this 19th day of February 2010.

FORD MOTOR COMPANY
By Counsel

/s/ Michael Bonasso
Michael Bonasso, Esq. (WV State Bar #394)
Elizabeth L. Taylor, Esq. (WV State Bar #10270)
Flaherty, Sensabaugh & Bonasso, PLLC
Post Office Box 3843
Charleston, West Virginia 25338-3843
304-345-0200
304-345-0260 (facsimile)
mbonasso@fsblaw.com
etaylor@fsblaw.com

and

Brian Anderson, Esq.
Scott M. Hammack, Esq.
Andrew S. Han, Esq.
All admitted pro hac vice
O'Melveny & Myers LLP
1625 Eye Street, N.W.
Washington, D.C. 20006-4001
(202) 383-5300
(202) 383-5414 (facsimile)
banderson@omm.com
shammack@omm.com
ahan@omm.com
Counsel for Defendant Ford Motor Company

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**COMMERCIAL STEAM CLEANING,
L.L.C., ANDREW E. HAROLD, CARLOS
HESS, and KATHY COLLINS**

Plaintiffs,

v.

**FORD MOTOR COMPANY and
NAVISTAR INTERNATIONAL
CORPORATION,**

Defendants.

Civil Action No.: 2:09-cv-01009

**DEFENDANT FORD MOTOR
COMPANY'S NOTICE OF VIDEOTAPED
DEPOSITION TO NAMED PLAINTIFF
ANDREW E. HAROLD**

CERTIFICATE OF SERVICE

I, Michael Bonasso, counsel for the defendant, Ford Motor Company, do hereby certify that on the 19th day of February, 2010, the foregoing **DEFENDANT FORD MOTOR COMPANY'S NOTICE OF VIDEOTAPED DEPOSITION TO NAMED PLAINTIFF ANDREW E. HAROLD** was served upon the following counsel of record through the CM/ECF system as follows:

Stephen P. Meyer, Esq.
Craig B. Giffin, Esq.
Meyer, Ford & Glasser
P.O. Box 11090
Charleston, WV 25339
smeyer@citynet.net
Stephen.Meyer@meyerandford.com
Craig.Giffin@meyerandford.com
Counsel for Plaintiffs

Kara Cunningham Williams
Teresa A. Kleeh, Esq.
Steptoe & Johnson PLLC
P. O. Box 1588
Charleston, WV 25326-1588
kara.williams@steptoe-johnson.com
teresa.kleeh@steptoe-johnson.com
*Counsel for Navistar International
Corporation and Navistar Inc*

/s/ Michael Bonasso

Michael Bonasso (WV Bar No. 394)